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12 UNITED STATES DISTRICT COURT
13
14 NORTHERN DISTRICT OF CALIFORNIA
15
16 OAKLAND DIVISION

17 IN RE COLLEGE ATHLETE NIL
18 LITIGATION

Case No. 4:20-cv-03919-CW

19 **STIPULATION AND ~~PROPOSED~~**
20 **ORDER TO EXTEND NON-PARTY**
21 **ELECTRONIC ARTS INC.'S TIME TO**
22 **FILE A DECLARATION IN SUPPORT**
23 **OF SEALING**

24 Judge: Hon. Claudia Wilken

25 Pursuant to Northern District of California Local Rule 7-12, Plaintiffs and Defendants in
26 the above-captioned action, along with non-party Electronic Arts Inc. ("EA"), by and through
27 their respective undersigned counsel, submit the following Stipulation seeking an order extending
28 the time by which EA must file a declaration or statement in support of the Parties' Omnibus
Sealing Motion.

WHEREAS, pursuant to multiple subpoenas served by the Parties, EA produced a
substantial amount of highly confidential information in this matter, some of which is included in
the Parties' respective class certification submissions; and

WHEREAS, pursuant to the Court's Order Modifying Sealing Procedures Relating to
Class Certification Briefing and Related Documents, the Parties are to file an Omnibus Sealing
Motion no later than fourteen (14) days from the last class certification filing (currently

September 1, 2023), and the Parties shall then serve the Omnibus Sealing Motion on all Non-Party Designating Parties (*See* ECF Nos. 207, 227); and

WHEREAS, counsel for EA will be out of the country for pre-planned and pre-paid travel leading up to the deadline for Non-Party Designating Parties to submit declarations or statements in support of sealing, currently set for September 29, 2023, and as such will be unable to review the Parties' Omnibus Sealing Motion, evaluate the scope and nature of the Parties' use of EA's highly confidential information, and prepare any necessary declaration or statement in support of sealing;

THEREFORE, EA and the Parties in the above-captioned action hereby agree and stipulate that (assuming the Parties submit and serve their Omnibus Sealing Motion as described above), upon order of this Court, the time for EA to file a statement or declaration in support of sealing, as set forth in Local Rule 79-5(f)(3), shall be on or before October 13, 2023.

Dated: September 5, 2023

Respectfully submitted

KEKER, VAN NEST & PETERS LLP

By: /s/ R. James Slaughter
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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1

Pursuant to Civil Local Rule 5-1(i)(3) of the Northern District of California, I, R. James Slaughter, attest that concurrence in the filing of the document has been obtained from each of the other signatories to this document.

/s/ R. James Slaughter
R. JAMES SLAUGHTER

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED, that EA's deadline to file a declaration or statement in support of sealing is hereby extended to October 13, 2023.

Dated: 9/6/2023



HON. CLAUDIA WILKEN
UNITED STATES SENIOR DISTRICT
JUDGE